

# **EXHIBIT 2**

**From:** [Califano, Mark G.](#)  
**To:** [Carney, Christopher](#); [Kornblau, David](#); [Connor, James](#); [Staren, Devon](#); [Cuellar, Carina](#); [Meehan, Laura](#); [Landsman, Roger J](#); [Welsh, Michael](#)  
**Cc:** [Henkin, Douglas W.](#); [Lafferman, Matthew A.](#); [Gomez Nelson, Melissa](#); [Pellegrino, Louis A.](#); [Jaros, Ashley N.](#)  
**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up  
**Date:** Thursday, October 12, 2023 6:58:26 PM

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Chris,

Despite diligent efforts, we have been unable to determine whether the operational version of the LP Server still exists and, if so, its current location or custodian. We have been unable to get any response from Naver Cloud either directly or through the entity that held the Naver account.

Mark

**Mark G. Califano**

Partner

 [+1 202 496 7327](tel:+12024967327)

[Washington, DC](#)

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**From:** Carney, Christopher <CarneyC@SEC.GOV>  
**Sent:** Thursday, October 12, 2023 4:24 PM  
**To:** Califano, Mark G. <mark.califano@dentons.com>; Kornblau, David <david.kornblau@dentons.com>; Connor, James <connorja@SEC.GOV>; Staren, Devon <StarenD@sec.gov>; Cuellar, Carina <CuellarC@sec.gov>; Meehan, Laura <MeehanLa@SEC.GOV>; Landsman, Roger J <landsmanr@SEC.GOV>; Welsh, Michael <WelshMi@SEC.GOV>  
**Cc:** Henkin, Douglas W. <douglas.henkin@dentons.com>; Lafferman, Matthew A. <Matthew.Lafferman@dentons.com>; Gomez Nelson, Melissa <melissa.gomeznelson@dentons.com>; Pellegrino, Louis A. <louis.pellegrino@dentons.com>; Jaros, Ashley N. <ashley.jaros@dentons.com>  
**Subject:** Re: SEC v. TFL - Meet and Confer Follow-Up

**[WARNING: EXTERNAL SENDER]**

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Dear Mark,

Tomorrow is the last day of discovery. Please provide us with a detailed update on where things stand with respect to your efforts to obtain a copy of the LP server and its data so that we can address this with the court if necessary.

Regards,

Chris

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**From:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>  
**Sent:** Friday, October 6, 2023 3:59 PM  
**To:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>  
**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>  
**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

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Not yet.

**Mark G. Califano**

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**From:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>  
**Sent:** Friday, October 06, 2023 3:36 PM  
**To:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>  
**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>  
**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

**[WARNING: EXTERNAL SENDER]**

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Dear Mark,

Have you obtained a copy of the LP Server yet, or do you have any updates on your efforts to do so?

Regards,

Chris

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**From:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>

**Sent:** Tuesday, October 3, 2023 8:15 AM

**To:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>

**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>

**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

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Dear Chris,

We have not withheld any information or data from you regarding the LP Server. We have conducted searches on TFL data stores and on its AWS account and were unable to identify the LP Server. The relevant documents we did identify (and produced to you) indicate that Gaza paid for the Naver Cloud hosting services and that the LP Server appears to have been operated on a Naver Cloud account. We have also learned that Gaza Labs is no longer an operational company and that many of its records were seized by Korean authorities.

We are attempting to get information from Naver Cloud on the status of the web service account that appears to have been used to host the LP Server and its contents. We have yet to get a response, but will let you know if and when we do.

Yours,

Mark

**Mark G. Califano**  
Partner

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**From:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>

**Sent:** Monday, October 02, 2023 8:21 PM

**To:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>

**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>

**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

**[WARNING: EXTERNAL SENDER]**

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Dear Mark,

It has now been nearly two weeks since you provided an update about the LP Server and its connection to TFL-affiliate Gaza Labs and its Naver Cloud account. Have you been able to obtain a copy of the LP Server and/or its data from Naver Cloud or do you have any other updates regarding the status of your efforts to obtain a copy of the LP Server? Not only are we fast approaching the close of discovery, but Defendant's expert Raj Unny has since our discussion issued a report highlighting the importance of this evidence that Defendants have thus far withheld from the SEC. It is therefore important that the LP Server be produced ahead of his deposition next week. Please provide us an update on the status of your efforts to obtain the data in question from Naver Cloud. We are available to meet and confer on this issue tomorrow.

Regards,

Chris

Christopher J. Carney  
Trial Counsel  
Enforcement Division  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
(202) 551-2379 (direct)  
(202) 674-6587 (cell)

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**From:** Carney, Christopher

**Sent:** Tuesday, September 26, 2023 5:53 PM

**To:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>

**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>

**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

Thank you for the update, Mark.

Regards,

Chris

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**From:** Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>

**Sent:** Tuesday, September 26, 2023 5:21 PM

**To:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>; Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>

**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>

**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

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Dear Chris,

We have made inquiries in Korea to obtain access and copies of any data that Naver Cloud has regarding the LP Server and are waiting for a response. Following your email below, we reached out to follow up and stressed this is a time sensitive matter for the parties. We will let you know when we hear back.

Mark

Mark G. Califano

Partner

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---

**From:** Carney, Christopher <[CarneyC@SEC.GOV](mailto:CarneyC@SEC.GOV)>

**Sent:** Tuesday, September 26, 2023 3:08 PM

**To:** Kornblau, David <[david.kornblau@dentons.com](mailto:david.kornblau@dentons.com)>; Connor, James <[connorja@SEC.GOV](mailto:connorja@SEC.GOV)>; Staren, Devon <[StarenD@sec.gov](mailto:StarenD@sec.gov)>; Cuellar, Carina <[CuellarC@sec.gov](mailto:CuellarC@sec.gov)>; Meehan, Laura <[MeehanLa@SEC.GOV](mailto:MeehanLa@SEC.GOV)>; Landsman, Roger J <[landsmanr@SEC.GOV](mailto:landsmanr@SEC.GOV)>; Welsh, Michael <[WelshMi@SEC.GOV](mailto:WelshMi@SEC.GOV)>

**Cc:** Henkin, Douglas W. <[douglas.henkin@dentons.com](mailto:douglas.henkin@dentons.com)>; Califano, Mark G. <[mark.califano@dentons.com](mailto:mark.califano@dentons.com)>; Lafferman, Matthew A. <[Matthew.Lafferman@dentons.com](mailto:Matthew.Lafferman@dentons.com)>; Gomez Nelson, Melissa <[melissa.gomeznelson@dentons.com](mailto:melissa.gomeznelson@dentons.com)>; Pellegrino, Louis A. <[louis.pellegrino@dentons.com](mailto:louis.pellegrino@dentons.com)>; Jaros, Ashley N. <[ashley.jaros@dentons.com](mailto:ashley.jaros@dentons.com)>

**Subject:** RE: SEC v. TFL - Meet and Confer Follow-Up

**[WARNING: EXTERNAL SENDER]**

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Dear Mark and David,

It has been a week since we had the call in which you provided a brief update about the LP Server and its connection to TFL-affiliate Gaza Labs and its Naver Cloud account. Have you been able to obtain a copy of the LP Server and/or its data from Naver Cloud or do you have any other updates regarding the status of your efforts to obtain a copy of the LP Server? Given the importance of the LP Server and the fast approaching close of discovery, it is important that we resolve this issue soon or bring it to the Court's attention.

Regards,

Chris

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